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Attorneys for Defendants VECTOR MARIETING CORPORATION

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

ALICIA HARRIS, as an individual and on
behalf of all others similarly situated,

Plaintiffs,
vs.

VECTOR MARKETING CORPORATION, a
Pennsylvania corporation; and DOES 1 through
20, inclusive,

Defendants.

Case No.: CV 08 5198 EMC

**JOINT STIPULATION AND [PROPOSED]
ORDER EXTENDING FRCP 30
LIMITATION ON NUMBER OF
DEPOSITIONS AND FRCP 33
LIMITATION ON NUMBER OF
INTERROGATORIES**

Assigned to the Hon. Edward M. Chen,
Courtroom C

ADDITIONAL PLAINTIFF'S COUNSEL

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1 Plaintiff Alicia Harris ("Plaintiff") and Defendant, Vector Marketing Corp.
2 ("Defendant"), by and through their counsel of record, hereby stipulate and agree as follows:

3 WHEREAS, FRCP 30(a)(2)(A)(i) provides that only ten (10) depositions may be taken
4 by each party throughout the course of a case;

5 WHEREAS, FRCP 33(a)(1) provides that only twenty-five (25) special interrogatories
6 may be propounded by each party throughout the course of a case;

7 WHEREAS, given the number of special interrogatories already propounded and the
8 number of depositions already conducted by the parties in relation to Defendant's Summary
9 Judgment Motion previously filed, the parties have met and conferred and agree that the ten (10)
10 deposition limit and the twenty-five (25) interrogatory limit will not provide the parties with
11 sufficient discovery to adequately brief the issues relating to class certification;

12 IT IS HEREBY STIPULATED by the parties herein, through their counsel of record, as
13 follows:

14 1. In addition to the ten (10) depositions allocated to each party pursuant to FRCP
15 30(a)(2)(A)(1), the number of depositions which may be taken to prepare for the filing of
16 Plaintiff's class certification motion and/or final FLSA certification, without leave of court or
17 further stipulation, is ten (10) depositions per party;

18 2. In addition to the twenty-five (25) interrogatories allocated to each party pursuant
19 to FRCP 33(a)(1), the number of special interrogatories which may be propounded to prepare for
20 the filing of Plaintiff's class certification motion and/or final FLSA certification, without leave of
21 court or further stipulation, shall be fifteen (15) special interrogatories.

22
23 IT SO STIPULATED.

24
25 Dated: June 16, 2010

MARLIN & SALTZMAN

26
27 By: /S/
28 Christina A. Humphrey, Esq.
Attorneys for Plaintiff

1 Dated: June 16, 2010

REED SMITH, LLP

2
3 By: /S/
4 Roxanne Wilson, Esq.
Attorneys for Defendant

5 I, Christina A. Humphrey, attest that I have obtained concurrence from Roxanne Wilson
6 in the filing of this Stipulation. See N.D. Cal. General Order 45 § 10(B).
7

8 **[~~PROPOSED~~] ORDER**

9
10
11 GOOD CAUSE APPEARING, IT IS SO ORDERED,
12

13 DATED: 6/17/10
14

